Docket Nos. 02-0798/03-0008/
03-0009 (Consolidated)
ICC Staff Exhibit 4.0

DIRECT TESTIMONY

OF

ERIC LOUNSBERRY

Engineering Department
Energy Division
Illinois Commerce Commission

Proposed General Increase in Gas Rates

Central Illinois Public Service Company

d/b/a

AmerenCIPS

and

Union Electric Company

d/b/a

AmerenUE

Docket Nos. 02-0798/03-0008/
03-0009 (Consolidated)

April 2, 2003

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Q. Please state your name and business address.

A. My name is Eric Lounsberry and my business address is: Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701.

Q. By whom are you employed and in what capacity?

A. I am employed by the Illinois Commerce Commission ("Commission") as the Supervisor of the Gas Section of the Engineering Department of the Energy Division. I have worked for the Illinois Commerce Commission since 1989.

Q. Please state your educational background.

A. I received a Bachelor of Science degree in Civil Engineering from the University of Illinois and a Master of Business Administration degree from Sangamon State University (now known as University of Illinois at Springfield).

Q. What are your primary responsibilities and duties as the Gas Section Supervisor of the Energy Division's Engineering Department?

A. I assign my employees or myself to cases, provide training, and review work products over the various areas of responsibility covered by the Gas Section. In particular, the responsibilities and duties of Gas Section employees include performing studies and analyses dealing with day-to-day, and long term, operations and planning of the gas utilities serving Illinois. For example, Gas Section employees review purchased gas adjustment clause reconciliations, rate

base additions, levels of natural gas used for working capital, and utility applications for Certificates of Public Convenience and Necessity. They also perform audits of utility gas meter shops.

Q. What is the purpose of this proceeding?

A. On November 27, 2002, Central Illinois Public Service Company ("CIPS") and Union Electric Company ("UE") (collectively "Companies") requested Commission approval to increase their natural gas rates.

Q. What are your duties and responsibilities associated with this docket?

A. My assignment is to determine if the Companies' requested level of working capital associated with its storage gas was reasonable and to review various aspects of the Companies' proposed tariffs.

Q. Do you have any schedules attached to your direct testimony?

A. Yes. I have the following schedules:

Schedule 4.1 UE	Summary of UE Adjustments
Schedule 4.2 UE	MRT Storage – Physical Inventory
Schedule 4.3 UE	Comparison of Gas in Storage Value
Schedule 4.1 CIPS	Summary of CIPS Adjustments
Schedule 4.2 CIPS	Ashmore Storage – Physical Inventory
Schedule 4.3 CIPS	Sciota Storage – Physical Inventory
Schedule 4.4 CIPS	Johnston City – Physical Inventory
Schedule 4.5 CIPS	NGPL DSS – Physical Inventory
Schedule 4.6 CIPS	Texas Eastern – Physical Inventory
Schedule 4.7 CIPS	Trunkline NNS – Physical Inventory
Schedule 4.8 CIPS	Panhandle Leased Storage Contracts
Schedule 4.9 CIPS	Comparison of Gas in Storage Value by Field

Q. What recommendations are you making in this proceeding?

A. I recommend that UE reduce its requested working capital allowance associated with gas in storage by $127,000, provide more detailed information regarding its decision to institute an Automated Meter Reading ("AMR") project, and to specify in its tariff that it will meet all requests for new service under certain conditions within 15 working days.

I recommend CIPS reduce its working capital allowance for gas in storage by $5,464,000, that it retire the Belle Gent storage field, and that it specify in its tariff that it will meet all requests for new service under certain conditions within 15 working days.

UE Adjustments

Working Capital Associated with Gas in Storage

Q. What amount of working capital allowance did UE request to cover the working gas, or top gas, contained in its natural gas storage fields?

A. UE requested an amount equal to $1,547,000 per Schedule B-5.1 of its 83 Ill. Adm. Code ("Part 285") filing.

Q. Do you agree that UE's requested level is reasonable?

A. No. I recommend that UE reduce the requested amount by taking into account the higher than average levels of natural gas contained in storage during the test

year versus historical years as well as make a minor correction due to the use of actual information rather than estimated information. After taking into account the higher than average levels of natural gas and making use of actual data results in a working capital allowance of $1,420,000 (1,547,000 – 127,000), which is $127,000 less than the value requested by UE as shown on ICC Staff Exhibit 4.0, Schedule 4.1 UE.

Q. What is working gas?

A. Working gas, also called top gas, is the volume of gas in a storage reservoir that is cycled (withdrawn during winter months, injected during the non-winter months) from storage.

Q. What is base gas?

A. Base gas is the volume of gas required in a storage reservoir to provide adequate pressure to cycle the working gas.

Q. In general, why does a gas utility use storage field supply?

A. In the winter months, a gas utility uses storage field supply to meet winter peak demand, while also avoiding the costs associated with contracting for other winter firm supply resources. In addition, a storage field's working gas is comprised of summer injections that are, under most circumstances, less expensive than winter resources. Therefore, there is usually an economic incentive to make use of storage field supplies.

Average Storage Volume

Q. What test year did UE select for this proceeding?

A. UE used the 12-month historical period July 1, 2001 through June 30, 2002.

Q. Do you consider the volume of natural gas on which UE based its requested working capital allowance a normal volume of natural gas to maintain in storage?

A. No. I reviewed the volume of natural gas that UE requested for a working capital allowance in the test year to the volume of natural gas for the prior 5 historical years. This review indicated the volume of gas contained in the test year was larger than any of the prior periods reviewed. Therefore, I consider the volume of gas that UE requested as a working capital allowance not to be a representative volume for the future. Instead, I recommend averaging the volumes of natural gas contained in the test year to the historical data to provide a more representative volume.

Q. How many storage fields does UE own or lease?

A. UE does not own any storage fields, but does lease one storage field from Mississippi River Transmission Corporation ("MRT").

Q. Has UE altered the manner that it operates the MRT storage field?

A. No. UE, when asked the same question in Staff data request UE-ENG 1.30, noted that it had not fundamentally changed the manner that it operates its leased storage field during the last five years.

Q. What is the impact of making use of an average volume of natural gas contained in storage versus the volume requested by UE?

A. As shown on ICC Staff Exhibit 4.0, Schedule 4.2 UE, the 6-year average volume of natural gas contained in UE's MRT leased storage field is less than the volume requested in the test year result by UE. Using the volume reduction and making use of the average cost of natural gas that UE maintained in the MRT field provide for an adjustment of $125,000 as shown on ICC Staff Exhibit 4.0, Schedule 4.2 UE.

Use of Actual Storage Data

Q. What data did UE use to determine its requested level of working capital allowance for gas in storage?

A. According to UE's response to Staff data request UE-ENG 1.29, UE relied upon the ledger amounts when it determined the appropriate working capital allowance for gas in storage in the instant proceeding. The ledger figures are estimates that also reflect the prior month's true-up. However, the information UE provided in response to Staff data request UE-ENG 1.8 reflects actual volumes as received from the pipeline.

Q. What data do you recommend the Commission rely upon to determine UE's appropriate working capital allowance for gas in storage?

A. I recommend the Commission base UE's working capital allowance for gas in storage from the actual information contained in UE's response to Staff data request UE-ENG 1.8. As shown on ICC Staff Exhibit 4.0, Schedule 4.3 UE, relying on actual data provides a reduction of $2,000 to UE's requested working capital allowance for gas in storage.

Summary of UE Gas in Storage Adjustments

Q. What is your overall recommendation regarding UE's requested working capital allowance for its gas in storage?

A. I recommend the Commission reduce UE's requested working capital allowance for gas in storage to $1,420,000, which is $127,000 less than the value requested by UE as shown on ICC Staff Exhibit 4.0, Schedule 4.1 UE. This value is obtained by taking into account the higher than average levels of natural gas contained in storage during the test year versus historical years as well as make a minor correction due to the use of actual information rather than estimated information.

Automated Meter Reading

Q. What is automated meter reading?

A. AMR refers to a technology that allows for the remote reading of a meter. In this proceeding, AMR refers to the wireless technology system that UE uses to obtain, aggregate, and transmit meter readings to the central billing computer, as is discussed in the Direct Testimony of Jimmy Davis, AmerenUE Exhibit No. 2.0, page 7.

Q. How is UE using AMR?

A. As noted in Mr. Davis' testimony, in 1999 UE converted all of its approximately 18,000 gas meters to an automatic meter reading process. Mr. Davis also noted that the benefits of the AMR conversion are ongoing.

Q. What are your concerns regarding UE's AMR system?

A. I am concerned that UE decided to employ the AMR system without conducting a cost/benefit study. UE, in response to Staff data request UE-ENG 1.33, provided a confidential report that discusses potential savings associated with instituting an AMR system. However, there was no information that compared the potential savings to the cost of instituting the AMR project. Further, Mr. Davis' own testimony is unclear regarding what benefits the AMR system is providing. Therefore, I request that UE provide more detailed information in its rebuttal testimony regarding the benefits and/or savings that result from using an AMR system. UE should also provide any cost versus benefit studies that were done prior to installing the AMR system.

Installation of New Services

Q. Do UE's proposed or current tariffs contain any language regarding how quickly it will provide service to new customers?

A. No.

Q. Do you believe that UE's tariff should contain language regarding how quickly it will provide service to new customers?

A. Yes.

Q. How long has UE historically taken to provide service connections to new customers?

A. I do not know. When I asked UE this question in Staff data request UE-ENG 1.36, UE noted that it strives to provide service to a new customer according to the schedule that is requested. There are, however, several factors including weather and new business volume that can prevent it from providing service by the requested date. This information also assumes that a distribution main extension is not necessary.

Q. What is the significance of the lack of a distribution main extension?

A. It is possible that a new customer requesting natural gas service is located in an area that does not contain a distribution main. If this happens, then the utility must extend the distribution main to the area near the customer prior to installing

that customer's service line. The amount of time for extending a distribution main would vary widely depending upon the length and size of the extension required, the availability of public right-of-way, and a multitude of other factors.

Q. Do you believe UE should specify in its tariff the maximum amount of time for a new customer service installation?

A. Yes. I recommend that the Commission modify UE's tariff to include a commitment to install new services in 15 working days or less. I base this recommendation on two points. First, 15 days is long enough for a new customer to wait for service. Also, 15 working days should provide UE enough time to receive the service request, schedule the work, and complete the installation without undue haste.

Second, UE has indicated that it intends to reduce staffing though an early retirement program. A 15-day new service installation time limit will help ensure that Ameren does not cause service deterioration with its resource reductions.

Q. As a matter of consistent policy, did Staff recommend the same 15-day limit on new service installations in the on-going Central Illinois Light Company ("CILCO") rate case, Docket No. 02-0837?

A. Yes. I am the Staff engineering witness assigned to that case. On March 20, 2003, I filed testimony that made the identical recommendation for CILCO.

Further, I will seek the same modification in the future rate cases of all gas utilities serving customers in Illinois.

Q. What tariff language changes are you recommending UE make in order to place limits on providing new services?

A. I recommend UE alter its tariff under the Terms and Conditions under Installation of Service, 1st Revised Sheet No. 11, by adding the following to the existing language.

> The Company shall provide service connections to new customers within 15 working days at the requested location once property grading is in place, any obstructions or construction materials are removed, the location for the meter installation is prepared, and a distribution main extension is not necessary in order to provide service.

Q. Do you have any other UE recommendations?

A. No.

CIPS Adjustments

Working Capital Associated with Gas in Storage

Q. What amount of working capital allowance did CIPS request to cover the working gas, or top gas, contained in its natural gas storage fields?

A. CIPS requested an amount equal to $27,390,000 per Schedule B-5.1 of its Part 285 filing.

Q. Do you agree that CIPS' requested level is reasonable?

A. No. I recommend that CIPS reduce the requested amount by taking into account the higher than average levels of natural gas contained in storage during the test year versus historical years, make a minor correction due to the use of actual information rather than estimated information, and not allowing any working capital allowance associated with the gas contained in three storage fields. After taking all of the above items into account results in a working capital allowance of $21,926,000 (27,390,000 – 5,464,000), which is $5,464,000 less than the value requested by the CIPS as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Average Storage Volume

Q. What test year did CIPS select for this proceeding?

A. CIPS used the 12-month historical period July 1, 2001 through June 30, 2002.

Q. Do you consider the volume of natural gas that CIPS based its requested working capital allowance a normal volume of natural gas to maintain in storage?

A. No. I reviewed the volume of natural gas that CIPS requested for a working capital allowance in the test year to the volume of natural gas for prior historical periods. This review indicated the volume of gas contained in the test year was larger than any of the prior periods reviewed. Therefore, I consider the volume of gas that CIPS requested as a working capital allowance not to be a representative volume for the future. Instead, I recommend averaging the

volumes of natural gas contained in the test year to the historical data to provide a more representative volume.

Q. How many storage fields does CIPS own or lease?

A. According to CIPS' response to Staff data request CIPS-ENG 1.33, CIPS is requesting a working capital allowance for ten storage fields. My understanding is that CIPS owns five of them and leases five of them.

Q. Has CIPS altered the manner that it operates these ten storage fields?

A. No. CIPS, when asked the same question in Staff data request CIPS-ENG 1.36, noted that it had not fundamentally changed the manner that it operates its company-owned or leased storage field during the last five years. CIPS also noted that when it renegotiated its leased storage contracts with various providers, it aggregated any multiple storage agreements into a single no-notice storage agreement.

Q. How long a time period did you use in determining the average amount of natural gas contained in each of the storage fields used by CIPS?

A. The time period depended upon the amount of information provided by CIPS. For example, for the CIPS-owned and operated storage fields, CIPS provided information that allowed the determination of a 13-month average for five historical years, including the test year. For the leased storage fields, the

minimum period used to determine a 13-month average volume was three years, since CIPS did not provide as much historical information regarding those fields.

Q. How did you account for any fields where CIPS had aggregated the prior contracts into a single no-notice storage agreement?

A. There was one leased storage agreement that fell into this category. For this contract, I combined the total gas in storage for the historical gas contracts and used that total to determine the reasonableness of CIPS' requested volume for the new single no-notice storage agreement. The comparison of the aggregated contract to the historical contracts is shown on ICC Staff Exhibit 4.0, Schedule 4.8 CIPS, pages 1 through 3.

Q. What is the impact of making use of an average volume of natural gas contained in storage versus the volume requested by CIPS?

A. As indicated on ICC Staff Exhibit 4.0, Schedule 4.2 CIPS through Schedule 4.8 CIPS, making use of an average volume of natural gas for all of CIPS' storage fields results in a volume adjustment for each field. The overall result of this volume adjustment reduces CIPS requested level of working capital for gas in storage by $4,617,000, as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Use of Actual Storage Data

Q. What data did CIPS use to determine its requested level of working capital allowance for gas in storage?

A. According to CIPS' response to Staff data request CIPS-ENG 1.33, CIPS relied upon the ledger amounts when it determined the appropriate working capital allowance for gas in storage in the instant proceeding. The ledger figures are estimates that also reflect the prior month's true-up. However, the information CIPS provided in response to Staff data request CIPS-ENG 1.8 reflects actual volumes as received from the pipeline.

Q. What data do you recommend the Commission rely upon to determine CIPS' appropriate working capital allowance for gas in storage?

A. I recommend the Commission base CIPS' working capital allowance for gas in storage from the actual information contained in CIPS' response to Staff data request CIPS-ENG 1.8. As shown on ICC Staff Exhibit 4.0, Schedule 4.9 CIPS, relying on actual data provides an increase of $7,000 to CIPS' requested working capital allowance for gas in storage.

Removing Gas in Storage for Three Storage Fields

Q. Earlier you noted that the Company requested a working capital allowance from ten storage fields. Do you agree that CIPS should receive a working capital allowance from all of these storage fields?

A. No. I recommend the removal of any working capital allowance for gas in storage associated with the Rotherwood, Richwood, and Belle Gent storage fields.

Rotherwood Storage Field

Q. Why do you recommend removal of any working capital allowance associated with the Rotherwood storage field?

A. According to the CIPS' response to Staff data request CIPS-ENG 1.53, the agreement for leasing the Rotherwood storage field terminated on April 1, 1998 and CIPS had 30 days after the termination date to withdraw any existing storage inventory. This response noted that CIPS removed its remaining storage inventory by April 23, 1998. Next, the response noted that as a result of Staff's data requests and for reasons unknown at this time, the termination of the agreement was never reported to the appropriate accounting personnel. Finally, the response noted CIPS has taken steps to remove the Rotherwood storage account from CIPS' books.

Essentially, it appears the request for a working capital allowance for gas in storage from the Rotherwood storage field was an error. Based upon the above information, I recommend the removal of any working capital allowance associated with the Rotherwood storage field.

Q. What is the adjustment associated with removing the working capital allowance associated with the gas in storage at the Rotherwood storage field?

A. Removing the gas in storage from Rotherwood results in a reduction to the CIPS' working capital allowance for gas in storage of $392,000, as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Richwood Storage Field

Q. Why do you recommend removal of any working capital allowance associated with the Richwood storage field?

A. According to CIPS' response to Staff data request CIPS-ENG 1.52, the Richwood storage field has been inactive since 1983 due to the poor condition of the gathering system and dehydration system. CIPS' request for a working capital allowance from this field is counter to the purpose of working capital. In particular, "For rate making purposes, working capital is a measure of investor funding of daily operating expenditures and a variety of nonplant investments that are necessary to sustain ongoing operations of the utility."[1]

Further, in a prior CIPS gas rate case, Docket No. 91-0193, the Commission in its March 18, 2002 Order, page 35, accepted a Staff adjustment to remove the Richwood storage field and its accumulated depreciation from rate base as well as the removal from operating expenses of the associated depreciation expense. This Order also noted that the Richwood storage field and its associated accumulated depreciation was removed from rate base in its prior rate case,

[1] Accounting for Public Utilities, p. 5-2, November 1995, by Robert Hahne, Gregory Aliff, and Deloitte & Touche LLP, November 1995.

Docket No. 90-0072.

CIPS has not operated the Richwood storage field for 20-years and the Commission, in prior Orders, removed the field and its expenses from CIPS' rates. I do not believe CIPS should have any gas in storage on its books for this field, let alone how that gas in storage qualifies as an investment to sustain the ongoing operations of the utility. Therefore, I recommend the removal of any working capital allowance associated with natural gas stored in this field.

I also request CIPS review its books and verify, in its rebuttal testimony, that there are no rate base or expense requests in the instant proceeding associated with the Richwood storage field. If CIPS locates any rate base or expense associated with the Richwood storage field, then it should remove those items from its requested rates or explain why it believes those items should remain in its requested rates.

Q. What is the adjustment associated with removing the working capital allowance associated with the gas in storage at the Richwood storage field?

A. Removing the gas in storage from the Richwood storage field results in a reduction to the CIPS' working capital allowance for gas in storage of $165,000, as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Belle Gent Storage Field

Q. Why do you recommend removal of any working capital allowance associated

with the Belle Gent storage field?

A. As I will detail in the next section of my testimony, I am recommending that CIPS retire this facility. If this recommendation is accepted, CIPS will no longer require a working capital allowance associated with gas in storage at the Belle Gent storage field.

Q. What is the adjustment associated with removing the working capital allowance associated with the gas in storage at the Belle Gent storage field?

A. Removing the gas in storage from the Belle Gent storage field results in a reduction to the CIPS' working capital allowance for gas in storage of $392,000, as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Summary of CIPS Gas in Storage Adjustments

Q. What is your overall recommendation regarding CIPS' gas in storage?

A. I recommend CIPS reduce its requested working capital allowance for gas in storage by taking into account the higher than average levels of natural gas contained in storage during the test year versus historical years, making a correction due to the use of actual information rather than estimated information, and not allowing any working capital allowance associated with the gas contained in three storage fields. After taking all of the above items into account results in a working capital allowance of $21,926,000, which is $5,464,000 less than the value requested by CIPS as shown on ICC Staff Exhibit 4.0, Schedule 4.1 CIPS.

Retirement of the Belle Gent Storage Field

Q. Provide a general description of the Belle Gent storage field.

A. According to CIPS' response to Staff data request CIPS-ENG 1.23, Belle Gent is a one-well field, remotely located approximately seven miles southeast of its Johnston City storage facilities. Natural gas withdrawn from the Belle Gent storage field is sent to the Johnston City storage field for measurement, pressure regulation, dehydration, and odorization. The Johnston City storage field is located in southern Illinois near the town of Johnston City.

Q. Why do you believe CIPS should retire its Belle Gent storage field?

A. CIPS cannot use the Belle Gent storage field to provide peak day deliverability to its customers and the non-peak day withdrawals are very infrequent. Therefore, I do not believe CIPS' customers receive any net economic benefit from the operation of the field. The Belle Gent storage field is no longer "used and useful".

Q. What do you mean by "used and useful"?

A. Section 9-211 of the Public Utilities Act ("Act") states as follows:

> The Commission, in any determination of rates or charges, shall include in a utility's rate base only the value of such investment which is both prudently incurred and used and useful in providing service to public utilities customers. 220 ILCS 5/9-211

Further, the Act provides a definition of used and useful in Section 9-212 that

states:

> A generation or production facility is used and useful only if, and only to the extent that, it is necessary to meet customer demand or economically beneficial in meeting such demand. 220 ILCS 5/9-212

Q. Why do you consider the Belle Gent storage field to not be "used and useful"?

A. Using the criteria contained in Section 9-212 of the Act, the Belle Gent storage field is not used and useful. Given CIPS inability to rely on the field for peak day demand demonstrates the facility is not necessary to meet customer demand. Further, the infrequency of its non-peak day usage does not support the need for the facility during non-peak day periods.

The Belle Gent storage field is also not economically beneficial. CIPS' inability to rely on the field for peak day demand eliminates the primary economic benefit that is received from a storage field. If the Belle Gent storage field provided peak day deliverability, then CIPS could reduce the amount of firm pipeline reservation and supply contracts by the amount of deliverability that Belle Gent provided, thus providing an economic benefit to customer. Since Belle Gent does not provide peak day deliverability, CIPS, and its customers, do not receive that benefit.

Another economic benefit that could be derived from the Belle Gent storage field is the commodity price differential between the non-winter injections and the winter withdrawals. Normally, gas is less expensive during the non-winter months versus what utilities must pay for gas during the winter. Therefore,

customers could receive a benefit on the commodity price of natural gas that is withdrawn during the winter. However, in the Belle Gent storage field's case, CIPS rarely makes use of the field. Therefore, any benefit CIPS' customers receive from any price differentials are likely offset by the cost incurred for the storage field itself, therefore no net economic benefits are received.

Q. What is the rate impact should CIPS retire the Belle Gent storage field?

A. I do not know. I asked CIPS this question in Staff data request CIPS-ENG 1.26 and CIPS responded that the impact is not known and a study has not been prepared to calculate the impact. Without knowing the cost of maintaining the Belle Gent storage field, a cost versus benefit study cannot be conducted.

Q. Why is CIPS unable to use the Belle Gent storage field to provide peak day deliverability?

A. CIPS' response to Staff data request CIPS-ENG 1.23 notes the reason the Belle Gent storage field is not used to meet peak day load is that a difference in the physical reservoir pressures between Belle Gent and Johnston City limits the peak day deliverability of Belle Gent to zero until February. However, once the reservoir pressure at Johnston City is sufficiently lowered, which is achieved by producing Johnston City at the beginning of the heating season, Belle Gent becomes available for late season withdrawals.

Q. Does CIPS frequently conduct late season withdrawals from Belle Gent?

A. No. I requested CIPS, in CIPS-ENG 1.46, provide the last ten occasions for the period November 1, 1993 through February 28, 2003 that it had used the Belle Gent storage field to provide winter supply service to customers. CIPS' response noted that it had withdrawn gas on four separate occasions since November 1, 1993 and that only two of those occasions occurred during the winter season. The first occasion for a winter season withdrawal took place between February 1, 1996 and February 4, 1996, while the second took place on February 24 and 25, 2003. The other two occasions occurred in September 2001 and June 2002. In total, CIPS provided twelve dates over the past ten years where it had withdrawn gas from the Belle Gent storage field.

Q. Would CIPS have been able to meet its customers requirements on the twelve days it withdrew gas from the Belle Gent storage field if that field was not in operation?

A. Yes. According to CIPS' response to Staff data request CIPS-ENG 1.47, CIPS' gas supply portfolio would have allowed it to provide reliable service to its customers in the event the Belle Gent storage field's capacity had not been available.

Q. Why has CIPS not used the Belle Gent storage field?

A. After reviewing CIPS data request responses, I concluded that the use of the Belle Gent storage field declined as a result of the development of the Johnston City storage field. CIPS received permission to include the Johnston City storage

field in base rates as result of a prior CIPS gas rate case, Docket No. 91-0193. Also, as noted above, the operation of the Belle Gent storage field is dependent upon the facilities located at the Johnston City storage field. Finally, the Johnston City storage field is much larger than the Belle Gent field. Therefore, once CIPS developed the Johnston City storage field, the Belle Gent storage field was no longer needed and in my opinion is no longer used and useful.

Q. Does CIPS agree that the Belle Gent storage field is no longer needed?

A. No. CIPS, in its response to Staff data request CIPS-ENG 1.24 noted that Belle Gent provides value to the ratepayers as a viable gas supply source for late season withdrawals. Further, CIPS indicated that the cost to use Belle Gent, as a gas supply source, is nominal and therefore it should remain in rate base.

Q. What is your recommendation?

A. I recommend the Commission find the Belle Gent storage field to not be used and useful and to direct CIPS to retire the Belle Gent storage field unless CIPS can show an economic benefit from the operation of the field or other benefit that I have overlooked. I also request CIPS address what costs associated with the Belle Gent storage field remain in its rates in its rebuttal testimony.

Installation of New Services

Q. Do CIPS' proposed or current tariffs contain any language regarding how quickly it will provide service to new customers?

A. No.

Q. Do you believe that CIPS' tariff should contain language regarding how quickly it will provide service to new customers?

A. Yes.

Q. How long has CIPS historically taken to provide service connections to new customers?

A. According to CIPS' response to Staff data request CIPS-ENG 1.5, CIPS noted that it strives to provide service to a new customer according to the schedule that is requested. There are, however, several factors including weather and new business volume that can prevent it from providing service by the requested date. This information also assumes that a distribution main extension is not necessary.

Q. What is the significance of the lack of a distribution main extension?

A. It is possible that a new customer requesting natural gas service is located in an area that does not contain a distribution main. If this happens, then the utility must extend the distribution main to the area near the customer prior to installing that customer's service line. The amount of time for extending a distribution main would vary widely depending upon the length and size of the extension required, the availability of public right-of-way, and a multitude of other factors.

Q. Do you believe CIPS should specify in its tariff the maximum amount of time for a new customer service installation?

A. Yes. I recommend that the Commission modify CIPS' tariff to include a commitment to install new services in 15 working days or less. I base this recommendation on two points. First, 15 days is long enough for a new customer to wait for service. Also, 15 working days should provide CIPS enough time to receive the service request, schedule the work, and complete the installation without undue haste.

Second, CIPS has indicated that it intends to reduce staffing through an early retirement program. A 15-day new service installation time limit will help ensure that Ameren does not cause service deterioration with its resource reductions.

Q. What tariff language changes are you recommending CIPS make in order to place limits on providing new services?

A. I recommend CIPS alter its tariff under the Terms and Conditions under Installation of Service, Original Sheet No. 10.002, by adding the following to the existing language.

> The Company shall provide service connections to new customers within 15 working days at the requested location once property grading is in place, any obstructions or construction materials are removed, the location for the meter installation is prepared, and a distribution main extension is not necessary in order to provide service.

Q. Do you have any other CIPS recommendations?

A. No.

Q. Does this conclude your direct testimony?

A. Yes.

Summary of UE Adjustments

1	Gas in Storage - Volume Adjustment	$125,000
2	Gas in Storage - Actual Inventory Value	$2,000
3	Total Reduction to Working Capital Allowance for Gas in Storage	$127,000

Row 1 = Adjustment per ICC Staff Exhibit 4.0, Schedule 4.2 UE

Row 2 = Adjustment per ICC Staff Exhibit 4.0, Schedule 4.3 UE

Row 3 = Row 1 + Row 2

Redacted

MRT Storage - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													
6	1997													
7	1996													

13 - Month Average for Test Year = Sum of June 2001 though June 2002 divided by 13

8	Average 13 - Month Volume (MMBtu)	
9	Volume Difference (MMBtu)	
10	Test Year Average Price ($/MMBtu)	
11	Adjustment	$125,220

Row 1 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 2 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 3 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 4 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 5 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 6 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 7 = MRT Storage Volume per UE Response to Staff data request UE-ENG 1.8
Row 8 = Average of the 13 - Month Volume
Row 9 = Difference between Test Year 13 - Month Average and Row 8 Value
Row 10 = 13-Month Average Price per MMBtu for Gas in Storage at MRT in Test Year
Row 11 = Row 9 * Row 10

Redacted

Comparison of Gas in Storage Value

		Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jun-01	13-Month Average
1	MRT														
2	Schedule B-5.1	$1,598,000	$879,000	$221,000	$2,000	$94,000	$618,000	$1,564,000	$2,188,000	$2,773,000	$3,418,000	$3,244,000	$2,607,000	$909,000	$1,547,308
3	Difference														$1,826

Row 1 = Actual Value of Gas in MRT Leased Storage Service per UE Response to UE-ENG 1.8

Row 2 = UE Requested Amount for Gas in MRT Leased Storage Service per UE Schedule B-5.1 of 285 filing

Row 3 = Difference in 13 - Month Average between Row 1 and Row 2

Summary of CIPS Adjustments

1	Ashmore Storage Adjustment	$563,000
2	Sciota Storage Adjustment	$193,000
3	Johnston City Storage Adjustment	$158,000
4	NGPL - DSS Storage Adjustment	$26,000
5	Texas Eastern Storage Adjustment	$135,000
6	Trunkline NNS Storage Adjustment	$126,000
7	Panhandle Storage Adjustment	$3,416,000
8	Total Storage Adjustment for Volume Adjustment	$4,617,000
9	Belle Gent Storage Inventory Value	$297,000
10	Rotherwood Storage Inventory Value	$392,000
11	Richwood Storage Inventory Value	$165,000
12	Gas in Storage - Actual Inventory Value	-$7,000
13	Total Reduction to Working Capital Allowance for Gas in Storage	$5,464,000

Row 1 = Schedule 4.2 CIPS
Row 2 = Schedule 4.3 CIPS
Row 3 = Schedule 4.4 CIPS
Row 4 = Schedule 4.5 CIPS
Row 5 = Schedule 4.6 CIPS
Row 6 = Schedule 4.7 CIPS
Row 7 = Schedule 4.8 CIPS
Row 8 = Sum of Rows 1 through 7
Row 9 = Schedule 4.9 CIPS
Row 10 = Schedule 4.9 CIPS
Row 11 = Schedule 4.9 CIPS
Row 12 = Schedule 4.9 CIPS
Row 13 = Sum of Rows 8 through 11

Redacted

Ashmore Storage - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													
6	1997													

13 - Month Average for Test Year = Sum of June 2001 through June 2002 divided by 13

7	Average 13 - Month Volume (MMBtu)	
8	Volume Difference (MMBtu)	
9	Test Year Average Price ($/MMBtu)	
10	Adjustment	$563,121

Row 1 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Ashmore Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 7 = Average of 13 - Month Volume
Row 8 = Difference Between Test Year 13 - Month Average and Row 7 Volume
Row 9 = 13 - Month Average Price per MMBtu for Gas in Storage at Ashmore in Test Year
Row 10 = Row 8 * Row 9

Redacted

Sciota Storage - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													
6	1997													

13 - Month Average for Test Year = Sum of June 2001 through June 2002 divided by 13

7	Average 13 - Month Volume (MMBtu)	
8	Volume Difference (MMBtu)	
9	Test Year Average Price ($/MMBtu)	
10	Adjustment	$192,833

Row 1 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Sciota Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 7 = Average of 13 - Month Volume
Row 8 = Difference Between Test Year 13 - Month Average and Row 7 Volume
Row 9 = 13 - Month Average Price per MMBtu for Gas in Storage at Sciota in Test Year
Row 10 = Row 8 * Row 9

Redacted

Johnston City - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													
6	1997													

13 - Month Average for Test Year = Sum of June 2001 through June 2002 divided by 13

7	Average 13 - Month Volume (MMBtu)	
8	Volume Difference (MMBtu)	
9	Test Year Average Price ($/MMBtu)	
10	Adjustment	$158,030

Row 1 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Johnston City Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 7 = Average of 13 - Month Volume
Row 8 = Difference Between Test Year 13 - Month Average and Row 7 Volume
Row 9 = 13 - Month Average Price per MMBtu for Gas in Storage at Johnston City in Test Year
Row 10 = Row 8 * Row 9

Redacted

NGPL DSS - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													

13 - Month Average for Test Year = Sum of January 2002 through June 2002 divided by 13

5	Average 13 - Month Volume (MMBtu)	
6	Volume Difference (MMBtu)	
7	Test Year Average Price ($/MMBtu)	
8	Adjustment	$25,872

Row 1 = NGPL - DSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = NGPL - DSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = NGPL - DSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = NGPL - DSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Average of 13 - Month Volume
Row 6 = Difference Between Test Year 13 - Month Average and Row 5 Volume
Row 7 = 13 - Month Average Price per MMBtu for Gas in Storage at NGPL - DSS Leased Storage in Test Year ($149,848 / 42,419 MMBtu)
Row 8 = Row 6 * Row 7

Redacted

Texas Eastern - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													

13 - Month Average for Test Year = Sum of June 2001 through June 2002 divided by 13

5	Average 13 - Month Volume (MMBtu)	
6	Volume Difference (MMBtu)	
7	Test Year Average Price ($/MMBtu)	
8	Adjustment	$134,639

Row 1 = Texas Eastern Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Texas Eastern Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Texas Eastern Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Texas Eastern Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Average of 13 - Month Volume
Row 6 = Difference Between Test Year 13 - Month Average and Row 5 Volume
Row 7 = 13 - Month Average Price per MMBtu for Gas in Storage at Texas Eastern Leased Storage in Test Year
Row 8 = Row 6 * Row 7

Redacted

Trunkline NNS - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													

13 - Month Average for Test Year = Sum of January 2002 through June 2002 divided by 13

6	Average 13 - Month Volume (MMBtu)	
7	Volume Difference (MMBtu)	
8	Test Year Average Price ($/MMBtu)	
9	Adjustment	$126,324

Row 1 = Trunkline - NNS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Trunkline - NNS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Trunkline - NNS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Trunkline - NNS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Trunkline - NNS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Average of 13 - Month Volume
Row 7 = Difference Between Test Year 13 - Month Average and Row 6 Volume
Row 8 = 13 - Month Average Price per MMBtu for Gas in Storage at Trunkline - NNS Leased Storage in Test Year
Row 9 = Row 7 * Row 8

Redacted

Panhandle Leased Storage Contracts

Comparison of All Panhandle Leased Storage Contracts

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													

13 - Month Average for Test Year = Sum of June 2001 through June 2002 divided by 13

6	Average 13 - Month Volume (MMBtu)	
7	Volume Difference (MMBtu)	
8	Test Year Average Price ($/MMBtu)	
9	Adjustment	$3,415,580

Row 1 = Summation of 2002 Storage Volumes from Schedule 4.8 CIPS, pages 2 and 3
Row 2 = Summation of 2001 Storage Volumes from Schedule 4.8 CIPS, pages 2 and 3
Row 3 = Summation of 2000 Storage Volumes from Schedule 4.8 CIPS, pages 2 and 3
Row 4 = Summation of 1999 Storage Volumes from Schedule 4.8 CIPS, pages 2 and 3
Row 5 = Summation of 1998 Storage Volumes from Schedule 4.8 CIPS, pages 2 and 3
Row 6 = Average of 13 - Month Volume
Row 7 = Difference Between Test Year 13 - Month Average and Row 6 Volume
Row 8 = 13 - Month Average Price per MMBtu for Gas in Storage at Panhandle - FSS Leased Storage in Test Year
Row 9 = Row 7 * Row 8

Redacted

Panhandle Leased Storage Contracts

Panhandle FSS - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													

Panhandle IOS - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
6	2002													
7	2001													
8	2000													
9	1999													
10	1998													

Row 1 = Panhandle - FSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Panhandle - FSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Panhandle - FSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Panhandle - FSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Panhandle - FSS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Panhandle - IOS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 7 = Panhandle - IOS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 8 = Panhandle - IOS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 9 = Panhandle - IOS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 10 = Panhandle - IOS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8

Redacted

Panhandle Leased Storage Contracts

Panhandle Flex - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
1	2002													
2	2001													
3	2000													
4	1999													
5	1998													

Panhandle WS - Physical Inventory

	Year	Jan (MMBtu)	Feb (MMBtu)	March (MMBtu)	April (MMBtu)	May (MMBtu)	June (MMBtu)	July (MMBtu)	Aug (MMBtu)	Sept (MMBtu)	Oct (MMBtu)	Nov (MMBtu)	Dec (MMBtu)	13-Month Average (MMBtu)
6	2002													
7	2001													
8	2000													
9	1999													
10	1998													

Row 1 = Panhandle - Flex Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 2 = Panhandle - Flex Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 3 = Panhandle - Flex Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 4 = Panhandle - Flex Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 5 = Panhandle - Flex Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 6 = Panhandle - WS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 7 = Panhandle - WS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 8 = Panhandle - WS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 9 = Panhandle - WS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8
Row 10 = Panhandle - WS Leased Storage Volume per CIPS Response to Staff data request CIPS-ENG 1.8

Redacted

Comparison of Gas in Storage Value by Field

		Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02	Jul-01	Aug-01	Sep-01	Oct-01	Nov-01	Dec-01	Jun-01	13-Month Average
1	Ashmore														
2	Sciota														
3	Johnston City														
4	Belle Gent														
5	NGPL-DSS														
6	Texas Eastern														
7	Trunkline- NSS														
8	Pan-FS														
9	Rotherwood														
10	Richwood														
11	Total	$29,045,160	$21,860,308	$14,342,290	$15,377,437	$18,934,171	$23,425,536	$29,639,902	$32,892,352	$35,886,237	$38,320,294	$37,178,020	$33,015,790	$26,243,490	$27,396,999
12	Schedule B-5.1	$28,993,000	$21,863,000	$14,338,000	$15,405,000	$18,919,000	$23,422,000	$29,640,000	$32,845,000	$35,900,000	$38,365,000	$37,099,000	$33,016,000	$26,266,000	$27,390,077
13	Difference														-$6,922

Row 1 = Actual Value of Gas in Ashmore Storage Field per CIPS Response to CIPS-ENG 1.8
Row 2 = Actual Value of Gas in Sciota Storage Field per CIPS Response to CIPS-ENG 1.8
Row 3 = Actual Value of Gas in Johnston City Storage Field per CIPS Response to CIPS-ENG 1.8
Row 4 = Actual Value of Gas in Belle Gent Storage Field per CIPS Response to CIPS-ENG 1.8
Row 5 = Actual Value of Gas in NGPL - DSS Leased Storage Service per CIPS Response to CIPS-ENG 1.8
Row 6 = Actual Value of Gas in Texas Eastern Leased Storage Service per CIPS Response to CIPS-ENG 1.8
Row 7 = Actual Value of Gas in Trunkline - NSS Leased Storage Service per CIPS Response to CIPS-ENG 1.8
Row 8 = Actual Value of Gas in Panhandle - FSS Leased Storage Service per CIPS Response to CIPS-ENG 1.8
Row 9 = Actual Value of Gas in Rotherwood Leased Storage Service per CIPS Response to CIPS-ENG 1.8
Row 10 = Actual Value of Gas in Richwood Storage Field per CIPS Response to CIPS-ENG 1.8
Row 11 = Total Actual Value of Gas in Storage for CIPS storage Fields (Summation of Rows 1 through 10)
Row 12 = CIPS Requested Amount of Gas per CIPS Schedule B-5.1 of 285 Filing
Row 13 = Difference in 13 - Month Average between Row 11 and Row 12